

**REMARKS**

This is in response to the Office Action mailed May 12, 2008. Claims 27-23 are pending. This response is being submitted with a one-month extension of time. For at least the reasons stated below, Applicants submit that all pending claims are in condition for allowance.

Claims 27-32 stand rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. Claims 27 through 29 and 31 through 32 stand rejected under 35 U.S.C. 103(a) as being unpatentable over United States Patent 7,356,530 to Kim et al. (herein referred to as “Kim”) in view of United States Patent 6,507,867 to Holland et al. (herein referred to as “Holland”). Claim 30 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Kim in view of Holland and in further view of United States Patent Application Publication 2002/0083090 to Jeffrey et al (herein referred to as “Jeffrey”).

Regarding the rejection of claims 27-32 under 35 U.S.C. §101, Applicants respectfully traverse. The Examiner states that “neither the means nor the data structures provide hardware components comprising a system.” Applicants recite limitations under 35 U.S.C. §112, ¶6, wherein the corresponding structure can be supported by the specification. It is recognized by one skilled in the art (as per the standard under 35 U.S.C. §112, ¶1) that a processing means can be implemented in a processing device. In other words, it is recognized under the applicable standard of 35 U.S.C. §112, ¶1, and in combination with the standard under 35 U.S.C. §112, ¶6, that software does not exist in a vacuum, but rather is embodied on physical processing components performing physical processing operations. Therefore, the recited invention falls within a statutory class of subject matter, a machine, and hence the rejection is improper. Should the Examiner maintain the present rejection, Applicants request further clarification from the Examiner as to how such a rejection can be maintained in direct

contradiction to the language of the specification (as per 35 U.S.C. §112, ¶6) and the knowledge of one skilled in the art (e.g. 35 U.S.C. §112, ¶1).

Regarding the rejection of claims under 35 U.S.C. §103(a), Applicants respectfully submit that neither Kim nor Holland, alone or in combination, teach or suggest all of the claimed elements of independent claim 27.

Kim discusses a system for retrieving one or more web pages by utilizing a web crawler. The system discussed by Kim performs a plurality of keyword analysis operations on the retrieved documents to provide search results based on the quality of the analyzed keywords. (Abstract; Col. 4, lines 30-44). Holland discusses a system for dynamically bundling a plurality of webpages for online or offline retrieval. The system discussed by Holland utilizes a proxy to dynamically serve offline content and a web server to bundle a plurality of documents and objects in response to detecting a match for a given descriptor. (Abstract; Col. 14, lines 14-50).

In contrast, independent claim 27 is directed towards a system for converting interactive Internet content to a form suitable for distribution to clients with a limited or non-existent return channel while preserving the interactivity of the content. The system comprises a means for selecting and partitioning one or more pages of interactive Internet content and a Page URL data structure storing data for use in identifying pages of interactive content. The system further comprises a Page Partition data structure storing data for use in tracking partitions that make up a page of interactive content and a Partition Link data structure storing data for use in tracking navigation data contained in a partition. The system comprises means for integrating data stored in the Page URL, Page Partition, and Partition Link data structures and partitions into a bundle and means for distributing the bundle to a client device.

One fundamental difference between the prior art and presently claimed invention is the aspect of partitioning an interactive document as presently claimed. The Examiner contends that Kim teaches this element through the use of a web crawler operative to “fetch pages from the Web.” (Col. 4, ll. 30-44) However, in the cited paragraphs of Kim, and in the remainder of the Kim reference, the Applicants are unable to find any reference to partitioning interactive documents. Additionally, the very use of a crawler, as utilized by Kim and as known in the art, does not explicitly or implicitly teach or suggest partitioning an interactive document into partitions. The crawler according to Kim simply retrieves a plurality of web pages from the Internet.

The teaching of Kim is further emphasized by Figs. 2A-2C of Kim, which illustrate the division of **each individual page** into a separate file. Figs. 2A-2C illustrate Kim’s 2 possible techniques for storing web pages of different sizes (Fig. 2A), the first technique is to have different size files (Fig. 2B) and the second technique is to standardize the file size and store empty space for smaller files and truncate larger files (Fig. 2C). These figures, as well as the teaching on col. 5, line 45 - col. 6, line 2 further supports that Kim relates to storing individual web pages found by the crawler, which is entirely inconsistent with the claimed partitioning. In other words, Kim does not partition the web pages themselves, but rather Kim divides distinct web pages into separate storage files. Storing a whole web page does not and cannot teach or suggest partitioning.

Additionally, the Examiner claims that Kim discusses categorizing and storing the crawled webpages in support of the assertion that Kim teaches or suggests partitioning an interactive document. While the Applicants point out that this aspect of Kim was not found with respect to the operation of a crawler, it is nevertheless considered irrelevant. The categorization

of web pages suffers from the previously mentioned deficiencies in partitioning a document. Even if the crawler categorizes and stores the retrieved webpages, this is not sufficient to teach or suggest “partitioning one or more pages of interactive documents” as presently claimed. Categorization merely assigns a label to a given document and pays no attention to partitioning the document to determine the categorization.

As Kim does not teach partitioning interactive documents, it logically follows that Kim is unable to teach or suggest a Page Partition data structure or a Partition Link data structure, as both of these data structures store data related to partitions extracted previously from the interactive document. Since Kim does not partition documents, it is clear that information related to the partitions can not possibly be stored by Kim. Therefore, the Applicants respectfully assert that Kim does not teach or suggest partitioning an interactive document through the use of a crawler operative to retrieve web pages.

Furthermore, the Examiner correctly states that Kim does not teach a “means for intergrating the data stored in the Page URL, Page Partition and Partition Link data structures and partitions into a bundle” but incorrectly asserts that Holland teaches or suggests this element. The bundles discussed in Holland are directed towards bundles of webpages or other media items associated with a descriptor. *See* Holland at Col. 13, lines 45-63. While Holland may utilize the term “bundle”, these bundles are substantially different from those in the presently pending claim. The bundles in Holland are directed towards grouping together various documents and objects related to a descriptor, not grouping partitions of a single interactive document. Holland more clearly depicts the contents of these bundles in Figures 6A and 6B, wherein a bundle contains refences to “page1.html”, “page2.html”, etc. It can not logically follow that multiple, distinct documents can teach or suggest partitions of a single document. Therefore it is clear that

Holland does not remedy the deficiencies of the Kim reference and further differentiates the prior art's use of distinct documents as opposed to partitions of interactive documents.

Claim 30 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Kim in view of Holland and in further view of Jeffrey. Upon review of the Jeffrey reference, it is the opinion of the Applicants that Jeffrey does not remedy the aforementioned deficiencies.

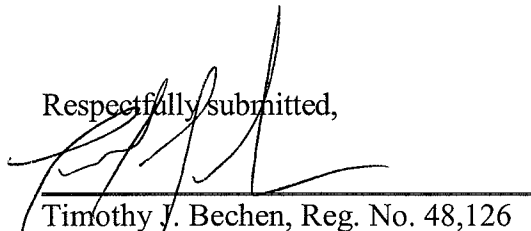
Therefore it is requested that claim 30 is allowable for at least the reasons stated above. Claims 28 through 29 and 31 through 32 depend from and recite further patentable subject matter from claim 27. These claims are allowable for at least the same reasons stated above.

For at least all of the above reasons, Applicant respectfully requests that the Examiner withdraw all rejections, and allowance of all the pending claims is respectfully solicited. To expedite prosecution of this application to allowance, the examiner is invited to call the Applicant's undersigned representative to discuss any issues relating to this application.

Dated: September 12, 2008

THIS CORRESPONDENCE IS BEING  
SUBMITTED ELECTRONICALLY THROUGH  
THE PATENT AND TRADEMARK OFFICE EFS  
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Respectfully submitted,



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